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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OPTICAL COMMUNICATIONS GROUP, INC.,

Plaintiff,

-against-

M/V AMBASSADOR, its engines, boilers,
furniture, tackle, apparel, etc., *in rem* and
MARBULK CANADA INC., *in personam*,

Defendants.

11 Civ. 4439 (NRB)

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT**

PLEASE TAKE NOTICE that, upon the annexed affidavits and exhibits, the accompanying Local Rule 56.1 Statement, the accompanying memorandum of law and all prior pleadings and proceedings herein, the undersigned attorneys for Defendants M/V AMBASSADOR, *in rem* and MARBULK CANADA INC. will move this Court before the Honorable Naomi Reice Buchwald, in Courtroom 21A at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on the 28th day of September 2012, or as soon thereafter as counsel may be heard, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of Defendants dismissing with prejudice all claims that have been asserted against Defendants in Plaintiff's Complaint and for such other, further and different relief as to the Court seems just and proper.

Dated: August 9, 2012

BLANK ROME LLP
Attorneys for Defendants,
M/V AMBASSADOR and MARBULK
CANADA INC.

By: /s/Richard V. Singleton

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